



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

*610 Federal Plaza
Central Islip, New York 11722*

January 19, 2016

BY HAND DELIVERY

The Honorable Joan Azrack
United States District Court
Eastern District of New York
920 Federal Plaza
Central Islip, New York 11722

The Honorable Arthur D. Spatt
United States District Court
Eastern District of New York
1020 Federal Plaza
Central Islip, New York 11722

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT
★ **JAN 19 2016** ★
LONG ISLAND OFFICE

Re: United States v. Juman Ganesh, Docket 16-CR-19 (JMA)
United States v. Hamant Mullick, Docket 14-CR-402 (ADS)

Dear Judge Azrack and Judge Spatt:

Pursuant to Local Rule 50.3.2, the government hereby notifies the Court that the case of United States v. Juman Ganesh, Docket 16-CR-019 (JMA) is presumptively related to the case of United States v. Hamant Mullick, Docket 14-CR-402 (ADS).

Local Rule 50.3.2(b)(1) provides for a "presumption that one case is 'related' to another when the facts of each arise out of the same charged criminal scheme(s), transaction(s), or event(s), even if different defendants are involved in each case." Local Rule 50.3.2(c)(1) directs the United States Attorney's Office to "give notice to all relevant judges whenever it appears that one case may be presumptively related to another pursuant to Section (b)(1)."

This letter constitutes the notice directed by Local Rule 50.3.2(c)(1). The two cases are presumptively related to each other because the facts of the cases arise out of the same criminal scheme, transactions and events. Specifically, in their operation of a manufacturing plant in Oceanside, New York, defendants Pardeep Malik and Hamant Mullick purchased counterfeit labels from defendant Juman Ganesh in which to package the counterfeit products they were manufacturing in Oceanside and other locales in Nassau County, New York.

As these cases are presumptively related, the government respectfully submits that reassignment of Docket 16-CR-019(JMA) to Judge Spatt would be appropriate, as it would likely result in a significant savings of judicial resources and serve the interests of justice.

Thank you for your consideration of this request.

Respectfully submitted,

ROBERT L. CAPERS
United States Attorney

By: /s/ Charles P. Kelly
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cc: Richard D. Haley, Esq. (By ECF and email)
Attorney for Juman Ganesh

Tracey Gaffey, Esq.
Attorney for Hamant Mullick (By ECF and email)

*Application granted.
So ordered.*

s/ Joan M. Azrack 1/19/16
Joan M. Azrack USDJ